

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

BANK RECORDS
STIPULATION

ARI TEMAN, :

19 Cr. 696 (PAE)

Defendant. :

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IT IS HEREBY STIPULATED AND AGREED by and between the United States of America, by Geoffrey S. Berman, United States Attorney, Kedar S. Bhatia and Edward Imperatore, Assistant United States Attorneys, of counsel, and Ari Teman, the defendant, by and through his counsel, Justin Gelfand, Esq., and Joseph DiRuzzo, Esq., that:

1. Government Exhibits 101, 102, 201, 202, 203, 204, 205, and 206 and Defense Exhibits 17, 34, and 52 are true and correct copies of bank records from bank accounts at Bank of America N.A., in the name of GateGuard, Inc., with account number ending in 8085.

2. Government Exhibits 103 and 104 are true and correct copies of bank records from a bank account at Bank of America N.A., in the name of Friend or Fraud, Inc., with account number ending in 0351.

3. Government Exhibits 105 and 106 are true and correct copies of bank records from a bank account at Bank of America

**GOVERNMENT
EXHIBIT
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N.A., in the name of Touchless Labs LLC, with account number ending in 1046.

4. Government Exhibits 107 and 108 are true and correct copies of bank records from a bank account at Bank of America N.A., in the name of Ari Teman, with account number ending in 5580.

5. Government Exhibit 113 is a true and correct copy of bank records from bank accounts at Bank of America N.A., in the name of GateGuard, Inc., with account number ending in 8085, in the name of Friend or Fraud Inc., with account number ending in 0351, in the name of Touchless Labs LLC, with account number ending in 1046, and in the name of Ari Teman, with account numbers ending in 7673 and 5580.

6. Government Exhibits 121, 122, 126, 127, and 130 and Defense Exhibits 50 are true and correct copies of bank records from bank accounts at JPMorgan Chase Bank N.A., in the name of ABJ Lenox LLC, with account number ending in 9100.

7. Government Exhibits 123, 124, 128, 129, and 131 and Defense Exhibits 49 and 51 are true and correct copies of bank records from bank accounts at JPMorgan Chase Bank N.A., in the name of ABJ Milano LLC, with account number ending in 1672.

8. Government Exhibits 141, 142, and 143 and Defense Exhibit 29 are true and correct copies of bank records from bank accounts at Signature Bank, N.A., in the name of 18 Mercer Equity

Inc., with account number ending in 8293.

9. Government Exhibits 144, 145, 146, and 150 and Defense Exhibit 29 are true and correct copies of bank records from bank accounts at Signature Bank, N.A., in the name of 518 West 204 LLC, with account number ending in 6525.

10. The records described in paragraphs 1 through 9 above were:

a. made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

b. kept in the course of regularly conducted business activity; and

c. made by the regularly conducted business activity as a regular practice.

IT IS FURTHER STIPULATED AND AGREED that Government Exhibits 101 through 108, 114, 121 through 124, 126 through 131, 141 through 146, 150, and 201 through 206 and Defense Exhibits 17, 29, 34, 52, 49, 50, and 51 consist of records that constitute business records pursuant to Rule 803(6) of the Federal Rules of Evidence. The defendant reserves any Rule 801(c) objection to the

admission, for the truth of the matter asserted, of any statement contained within Government Exhibits 126 and 128.

Dated: New York, New York
January 22, 2020

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: 

Kedar S. Bhatia/Edward Imperatore
Assistant United States Attorneys



Justin Gelfand/Joseph DiRuzzo
Attorneys for Ari Teman